



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SENT VIA CERTIFIED MAIL

DEC 31 2019

D&F Sawmill c/o Mr. Freeman Miller
836 Pike Road
Punxsutawney, Pennsylvania 15767

Dear Mr. Miller:

Enclosed is the inspection report documenting the observations made by the United States Environmental Protection Agency (EPA) during the November 14, 2019 Clean Water Act (CWA) inspection at your sawmill operation located at 4053 Pike Road, Punxsutawney, PA 15767. I encourage you to read it carefully. If you believe any of the information is inaccurate, please provide a written response to EPA within 30 calendar days to be included in our records.

This inspection report and any other information gathered by the EPA may be used in determining compliance with the Clean Water Act. Below are some preliminary observations:

1. There was an unpermitted stormwater outfall located in the berm along log storage area at north side of the facility that was not covered by the facility's NPDES Permit. The unpermitted stormwater outfall discharged downslope toward Stump Creek. At the closing conference, Mr. Kicher of Pennsylvania Department of Environmental Protection (PADEP) explained that the facility would need to either eliminate this unpermitted outfall or submit a new NOI and application fee to have this unpermitted outfall added to the facility's NPDES Permit.
2. Sawdust was observed beyond the confines of the sawdust storage sheds. Sawdust was observed on the ground in the following locations where it was exposed to precipitation and runoff:
 - a. In front of and behind the sawdust storage shed on the south side of Pike Road;
 - b. Behind the Freeman Miller sawmill;
 - c. In front of and on the side of sawdust storage shed on the north side of Pike Road;
 - d. Next to and on snow that was next to the wood chip storage bin.Part C.II.C.1 of the facility's NPDES Permit states that the facility shall "Implement a routine cleaning and maintenance program for all impervious areas of the facility where particulate matter, dust or debris may accumulate to minimize discharge of pollutants in stormwater." Appendix D Part V.H of the facility's NPDES Permit requires "At mill facilities, use dust control practices to limit fugitive emissions."
3. There was a pile of old bark waste stored to the west of the debarker on the south side of Pike Road. This pile of old bark waste was stored outside exposed to precipitation and stormwater. The PADEP-approved hardwood manual states on page 12 in Section 3.2 that "...the optimal storage period may be approximately 60 days or less." According to Mr. Gould, the bark piles are transported off site and sold for mulch during the gardening season and can be onsite for



several months during the winter. EPA inspectors did not observe any of the BMPs from the aforementioned DEP manual to prevent or control stormwater around the bark pile.

4. Flammable debarker waste products were located in the debarker fuel secondary containment on the south side of Pike Road.
5. Anchorseal was observed on the ground outside of the lumber grading building.
6. The facility did not have the required Preparedness, Prevention and Contingency (PPC) Plan on-site and available for review at the time of the inspection.
7. The Annual Report that was on-site appeared to have incorrect dates; the Annual Report was supposedly for the period January 1, 2018 to December 31, 2018, however the inspection date noted on the Annual Report was April 18, 2019.
8. The Annual Report did not record any stormwater sampling events.
9. The facility did not have the previous years' Annual Reports on-site and available for review at the time of the inspection.
10. The facility was required to implement a Correction Action Plan (CAP) previously due to benchmark exceedances. The facility did not have the CAP on-site and available for review at the time of the inspection, so it is unclear whether the CAP was fully implemented.

Compliance is an ongoing requirement. EPA's website (<https://www.epa.gov/npdes/stormwater-discharges-industrial-activities>) provides compliance information regarding stormwater discharges from industrial activities, including timber products industrial activity.

If you have any questions or concerns, please call me at (215) 814-2319.

Sincerely,



Mark Zolandz
NPDES Section
Enforcement & Compliance Assurance Division

Enclosure

cc: Eric Kicher, PADEP
Justin Dickey, PADEP